

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

UNITED STATES OF AMERICA

v.

DANIEL MARC LOFARO,

*Defendant.*

Case No. 1:23-CR-156

Hon. Rossie D. Alston

**CONSENT MOTION TO CONVERT MAY 1, 2024 HEARING TO  
CHANGE OF PLEA HEARING AND TO SUSPEND TRIAL DEADLINES**

The United States of America, with the consent of the defendant, respectfully requests that the Court convert the May 1, 2024 Motion Hearing to a change of plea hearing and suspend the trial deadlines through and including May 1, 2024. In support thereof, the government states the following:

1. A Motion Hearing is currently scheduled for May 1, 2024 at 11:00 a.m. The parties' motions in limine must also be filed by May 1, 2024. *See* Docket Entry ("DE") 45 (Trial Order).
2. The defendant's counsel has indicated that the defendant intends to enter a guilty plea to Counts 1 through 4 of the Superseding Indictment, charging him with coercion and enticement of a minor, and distribution, receipt, and possession of child pornography. *See* DE 33. Upon information and belief, defense counsel will provide undersigned counsel and the court with signed copies of the plea agreement and statement of facts in advance of the May 1, 2024 hearing.
3. Accordingly, the parties request that the May 1, 2024 hearing be converted to a change of plea hearing.

4. Additionally, the parties request that the trial deadlines through and including May 1, 2024 be suspended, thereby permitting the government to avoid preparing for trial and allowing the government and the court to allocate their resources efficiently.

For the foregoing reasons, the United States, with the consent of the defendant, respectfully requests that the Court convert the May 1, 2024 Motion Hearing to a Change of Plea Hearing and suspend the trial deadlines through and including May 1, 2024.

Respectfully submitted,

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